



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
WASHINGTON, DC 20350-2000

ENCLOSURE(8)

IN REPLY REFER TO

5090
Ser 452/6U391702
6 Feb 86

OLD INFO

From: Chief of Naval Operations
To: Commander, Naval Sea Systems Command

Subj: IDENTIFICATION OF GENERATOR FOR SHIPBOARD HAZARDOUS WASTE
(HW)

Ref: (a) CNO ltr 5090 Ser 452/5U396484 of 11 Dec 85

1. Reference (a) provided policy guidance and identified generator responsibilities when hazardous wastes are produced aboard a Navy ship when the ship is in a private shipyard. The stated policy is that HW is to be considered contractor generated and the contractor should use his generator number, perform all of the duties of the generator, and comply with all generator responsibilities under RCRA. The same policy applies when the ship is in a government owned/contractor operated (GO/CO) facility.

2. Since the release of reference (a), we have received several inquiries as to "who is the generator" when a private contractor working on a Navy ship at a Naval facility generates HW. When a Navy ship is undergoing repair/overhaul at a Naval facility and either the Navy or a contractor performs the work, the Navy is the generator and the Navy's generator number assigned to the activity should be used. The actual disposal work and all of the duties of the generator can be performed by Naval personnel or the contract can be written so that the contractor assumes and performs the duties of the generator on behalf of the Navy. In either case, the Navy generator number assigned to the activity should be used.

3. In summary, when Navy repair or overhaul work is performed at a private contractor facility or at a GO/CO, the contractor's generator number is to be used for the disposal of all hazardous waste generated while the ship is at that private facility. When the work is performed at a Naval facility, the Navy's generator number is to be used.

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SUBJ: IDENTIFICATION OF GENERATOR FOR SHIPBOARD HAZARDOUS WASTE
(HW)

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NAVSEA
STANDARD WORK ITEM

SHIP
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ITEM NO
PCN
SURVEYOR

1ST VERSION

1. SCOPE

1.1 Title: Hazardous Waste; procedures for handling of initial on board waste removed from ship at contractor facility.

1.2 Location of work:

2. REFERENCES

- a. Resource Conservation and Recovery Act (RCRA) 42 U.S.C. § 6901 et seq.
- b. RCRA regulations, 40 C.F.R. Part 262
- c. (Appropriate State Code or Standards)
- d. (Appropriate Regional or Local Code or Standards)
- e. Hazardous Waste Manifest Form EPA Form 8700-22, as implemented by state.

3. REQUIREMENTS

3.1 Comply with the requirements of 2.a, 2.b, 2.c, and 2.d.

3.1.1. Applicable definitions, including "hazardous waste," are contained in 2.a, 2.b, 2.c, and 2.d.

3.2 Provide all services required for the lawful removal and disposal of a quantity of _____ plus or minus _____ percent of hazardous waste on-board the ship at the time of arrival at the contractor's facility.

3.2.1 Identify hazardous waste to be disposed utilizing the services of a testing laboratory approved under 2.c and 2.d for analysis of any waste of an unknown nature prior to offloading from ship.

3.2.2 Complete all blocks required to be completed by Generator on 2.c.

3.2.2.1 Include contract job order number in Generator block.